

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)	
)	
Price Cap Performance Review)	CC Docket No. 94-1
for Local Exchange Carriers)	
)	
Treatment of Operator Services)	CC Docket No. 93-124
Under Price Cap Regulation)	
)	
Revisions to Price Cap Rules for AT&T)	CC Docket No. 93-197

OPPOSITION OF AMERITECH TO
MOTION FOR EXTENSION OF TIME

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Ameritech¹ submits this opposition to the motion of Ad Hoc Telecommunications Users Committee ("Ad Hoc") for a three-month delay for the filing of comments and reply comments in response to the LEC Pricing Flexibility NPRM in this docket.² Ad Hoc complains that the proximity of the filing dates for comments and replies in this docket and the Commission's related dockets dealing with price caps for LEC video dialtone services and with the LEC price cap X-factor³ make it impracticable for it to devote significant resources to any single proceeding.

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

² *Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, Second Further Notice of Proposed Rulemaking in CC Docket No. 94-1, Further Notice of Proposed Rulemaking in CC Docket No. 93-124, and Second Further Notice of Proposed Rulemaking in CC Docket No. 93-197, FCC 95-393, released September 20, 1995 ("LEC Pricing Flexibility NPRM").

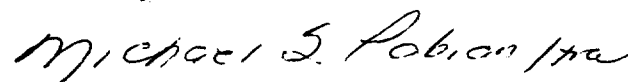
³ *Price Cap Performance Review for Local Exchange Carriers; Treatment of Video Dialtone Services Under Price Cap Regulation*, CC Docket No. 94-1, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 95-394, released September 21, 1995 ("VDT NPRM"); *Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, Fourth Further Notice of Proposed Rulemaking, FCC 95-406, released September 27, 1995 ("X-Factor NPRM").

One of the reasons that Ad Hoc suggests not deferring the X-factor proceeding is its view that "[t]he currently effective X-factors are too low."⁴ Therefore, according to Ad Hoc, the Commission should devote its attention to raising the X-factor before it deals with the issue of LEC pricing flexibility. However, the current X-factors applicable to LEC price caps were just re-set by the Commission last April.⁵

Moreover, in that same Order, the Commission left the issue of LEC pricing flexibility unresolved, despite having received extensive comments in the proceeding. Because of this and because of the increasing competitive pressures for the provision of access services faced by many price cap carriers, it is important that the Commission deal promptly with the issues in the LEC Pricing Flexibility NPRM. While Ameritech would not oppose a modest extension of no more than three weeks, Ad Hoc's proposed three month delay is completely out of line. The issues are too important.

In light of the foregoing, the Commission should deny Ad Hoc's motion for a three-month delay for filing comments and replies in response the LEC Pricing Flexibility NPRM.

Respectfully submitted,



Michael S. Pabian
Attorney for Ameritech
Room 4H82
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(708) 248-6044

Dated: November 6, 1995

⁴ Ad Hoc Motion at 2.

⁵ Price Cap Performance Review for Local Exchange Carriers, CC Docket No. 94-41, FCC 95-132, First Report and Order, released April 7, 1995.

CERTIFICATE OF SERVICE

I, Deborah L. Simmons do hereby certify that a copy of the foregoing Opposition of Ameritech to Motion for Extension of Time has been served on the party listed below, by first class mail, postage prepaid, on this 6th day of November 1995.

By: Deborah Simmons/tra
Deborah L. Simmons

James S. Blazak
Attorneys for
Ad Hoc Telecommunications
Users Committee
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, Suite 500
Washington, DC 20036-1703